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Attorneys for Debtor-in-Possession
Joseph M. Casello, Esq.

UNITED STATES BANKRUPTCY COURT
District of New Jersey

In re:	:	
	:	Chapter 11 Case No. 17-13489
Gabriel's Towing & Recovery, Inc.	:	
	:	Judge: Michael B. Kaplan, U.S.B.J.
Debtor-in-Possession	:	
	:	Hearing Date: November 13, 2017 at 10:00

NOTICE OF MOTION TO SELL THREE VEHICLES
PURSUANT TO 11 U.S.C. §363(b) & (f)

TO: Nancy Isaacson, Esq.
Greenbaum Rowe Smith & Davis, LLP
75 Livingston Avenue
Roseland, NJ 07068
Attorney for Creditor, Langan Commercial Realty

Office of the United States Trustee
One Newark Center – Suite 2100
Newark, New Jersey 07102

Saldutti Law Group
Robert L. Saldutti, Esquire
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800 N. Kings Highway
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Attorney for Creditor, Santander Bank, NA f/k/a Sovereign Bank, NA

Anitra Walker, Esq.
The Aubrey Law Firm
12 Powder Springs Street, Suite 240
Marietta, Georgia 30064
Attorneys for On Deck Capital, Inc.

PLEASE TAKE NOTICE that on November 13, 2017 at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for the Debtor in the within bankruptcy proceeding will move before the Honorable Michael Kaplan, U.S.B.J., at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey for an order authorizing the Debtor to sell three vehicles pursuant to 11 U.S.C. §363(b) & (f).

Upon the return date of the within motion, the undersigned shall rely upon the certification of Gabriel Lopez and the oral arguments of counsel, if necessary.

PLEASE TAKE FURTHER NOTICE that in accordance with Local Rule 9013 of the Rules of Procedure governing the practice before the United States Bankruptcy Court for the District of New Jersey, this motion may be deemed uncontested if no one files written responses and serves same on counsel for the moving party seven days or more before the return date. If no responsive pleading is filed the Court may enter the relief requested on the papers submitted.

COLLINS, VELLA & CASELLO, L.L.C.
Attorneys for Gabriel's Towing & Recovery, Inc.

Dated: 10-19-17

By: /s/ Joseph M. Casello
Joseph M. Casello, Esq.